

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SHAWN DRUMGOLD,)	C.A. NO. 04-11193NG
PLAINTIFF)	
)	
v.)	
)	
TIMOTHY CALLAHAN, FRANCIS M.)	
ROACHE, PAUL MURPHY , RICHARD)	
WALSH, AND THE CITY OF BOSTON,)	
DEFENDANTS)	

DEFENDANT, PAUL MURPHY'S, MANDATORY
DISCLOSURE PURSUANT TO FED. R. CIV. P. 26(a) AND LOCAL RULE 26.2

(a)(1)(A) Individuals With Discoverable Information

Defendant Paul Murphy believes that the following individuals may have information relative to the subject matter of the Plaintiff's Complaint:

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Kenya Alexander
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Patricia Murphy
Malden, MA

The Defendant reserves the right to amend and supplement this list throughout the discovery period in this case.

(a)(1)(B) Documentation

The Defendant does not have documents pertaining to this matter other than the transcripts of the original pre-trial hearings, trial, and motion for new trial hearings, which have previously been provided by counsel for the Plaintiff.

The Defendants reserve the right to amend and supplement this list throughout the discovery period in this case.

(a)(1)(C) Computation of Damages

Defendant Paul Murphy is unaware of the manner employed to calculate Plaintiff's damages as set forth in the Complaint.

(a)(1)(D) Insurance Coverage

Defendant Paul Murphy is deceased and does not have any personal insurance that would cover the allegations as set forth in the Complaint.

The Defendant reserves the right to amend and supplement this list throughout the discovery period in this case.

PATRICIA MURPHY, AS
EXECUTRIX OF THE ESTATE OF
PAUL MURPHY
By her Attorney,

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Date: April 18, 2006

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing document was served by ECF filing to all other parties of record on this 18th day of April, 2006.

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/S/ William M. White, Jr.
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